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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	NO. CR-20-00459 EJD
Plaintiff,	)	STIPULATION TO CONTINUANCE AND
v.	)	EXCLUSION OF TIME FROM JANUARY 10, 2022
	)	TO MARCH 14, 2022 AND ORDER
MIGUEL MARTIN PACHECO MARTINEZ	)	
& ALBERTO MARTINEZ NAVARRO,	)	
Defendants.	)	

The above-captioned matter is set for an initial status conference on January 10, 2022. The government has produced discovery to both defendants. The parties now request a continuance of the status conference until March 14, 2022, to allow the parties time to review discovery and discuss possible resolution.

It is hereby stipulated by and between counsel for the United States and counsel for the defendants Miguel Martin Pacheco Martinez and Alberto Martinez Navarro that the status conference set for January 10, 2022 be continued to March 14, 2022 at 1:30 p.m., and that time be excluded under the Speedy Trial Act from January 10, 2022 through March 14, 2022 to allow for the effective

1 preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

2 The parties further stipulate and agree that the ends of justice served by excluding the time from  
3 January 10, 2022 through March 14, 2022 from computation under the Speedy Trial Act outweigh the  
4 best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

5 The undersigned Assistant United States Attorney certifies that she has obtained approval from  
6 counsel for the defendant to file this stipulation and proposed order.

7  
8 IT IS SO STIPULATED.

9 DATED: January 6, 2022

/s/  
\_\_\_\_\_  
ALEXANDRA SHEPARD  
Assistant United States Attorney

10  
11 DATED: January 6, 2022

/s/  
\_\_\_\_\_  
ARTURO HERNANDEZ  
Counsel for Defendant Miguel Martin Pacheco  
Martinez

12  
13  
14 DATED: January 6, 2022

/s/  
\_\_\_\_\_  
PETER LEEMING  
Counsel for Defendant Alberto Martinez Navarro

**ORDER**

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from January 10, 2022 through March 14, 2022 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from January 10, 2022 through March 14, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from January 10, 2022 through March 14, 2022 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: January 7, 2022



HON. EDWARD J. DAVILA  
UNITED STATES DISTRICT JUDGE